Robson Valley Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests
Robson Valley Forest District
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This is a summary of the public input received on the Timber Supply Review in the Robson Valley Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Robson Valley Timber Supply Area

Background

As part of the review of timber supply in the Robson Valley Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Robson Valley TSA *Data Package* and *Information Report* in December, 1998. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Robson Valley TSA. A 30-day review period, ending January 15, 1999, was provided for the public to comment on these documents.

On May 18, 2000, the British Columbia Forest Service released the *2000 Robson Valley Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended July 17, 2000.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Robson Valley TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Robson Valley Forest District office.

Public Review Process and Response

Robson Valley District staff actively solicited public input on the Timber Supply Review in the Robson Valley TSA through the following actions:

- direct mail-out of the *Information Report, Data Package, Analysis Report* and *Public Discussion Paper* to key organizations in the Robson Valley TSA or adjacent timber supply areas.
- the *Data Package* and the *Robson Valley Timber Supply Area Analysis Report* were available at the district office.
- meetings regarding the *Data Package* were held with representatives from local government, the forest industry and other interest groups.
- local newspapers were contacted to encourage articles.

The Robson Valley Forest District received 15 written submissions on the *Data Package* and 15 submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Robson Valley TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Land Base Factors

Five submissions comment on the size of the area considered available for harvesting (i.e., the operable land base). Two submissions note that helicopter logging and other new methods such

as long distance skyline harvesting may increase the size of the operable land base, and one notes the use of helicopter logging in the past three years. Two other submissions say that due to market conditions and projections, the operability line should be moved downslope. A forest consultant says more work is needed to define operability and notes that most easy terrain has been harvested and the majority of remaining first pass wood is at the back end of valleys.

Zeidler Forest Industries says the exclusions from the land base for other values mean the target of a maximum 6% impact on timber supply as a result of implementing the Forest Practices Code will be significantly exceeded. A forest consultant says the methods used to develop netdowns for riparian and wildlife values appear to give an accurate estimate. However, this submission says that rather than a netdown only for slope and non-forested types, a more specific netdown by mapsheet would give a more accurate estimate and would allow netting out of small, isolated areas and wood that depends on construction of extremely difficult roads. The consultant suggests a cable partition of the harvest may be appropriate to respond to terrain stability issues.

Three submissions say that known cultural features should be accounted for in the analysis and should be protected from harvesting for historic and economic reasons. The features mentioned are First Nations villages near Tete Jaune and the Raush River mouth, early European sites such as Tete Jaune, and the Goat River trail.

A consultant's submission says the 2.3% netdown from the harvesting land base for roads, trails and landings appears low compared to other districts, and this figure should be reviewed. The same submission says good analysis methods were used to remove non-merchantable areas, but the new approach needs to be made explicit in the documentation.

Expected Rate of Growth and Productivity

A consultant's submission says yield curves were not outlined in the *Data Package* but must be checked against actual volumes. The consultant says rotation culmination age and the time required to reach minimum harvestable volumes are especially critical factors. Slocan Forest Products says the minimum volume needed for stands to be considered harvestable can be reduced by 50 m^3 per hectare, especially in spruce-leading stands.

Regeneration

The Fraser Headwaters Alliance (FHA) and the Canoe-Robson Environmental Coalition (CREC) maintain that a regeneration delay of 2.6 years is too short, based on the history of plantation failures and the future anticipated effects of global climate change on plantation establishment. Using the precautionary principle, the two groups say regeneration delay should be increased to four years.

A consultant's submission says the estimate of not satisfactorily restocked (NSR) areas would be more accurate if done on smaller areas (polygons) rather than analysis units. This submission also says the Forest Renewal B.C. funding levels required to restock backlog NSR should be made explicit. Slocan Forest Products says the 10-year target for regeneration of backlog NSR should be changed to five years since the district Forest Renewal group considers this work a priority.

Waste & Breakage

The FHA and CREC note that the *Data Package* does not discuss waste and breakage levels. The two groups are of the opinion that considerably less wood is delivered to the mills than is cruised, particularly from mature cedar-hemlock stands.

Visual Quality

Seven submissions comment on the use of measures (visual quality objectives, or VQOs) to protect visual quality in the Robson Valley TSA.

Robson Valley Timber Supply Area

Three submissions express concern about the impacts of the current approach on industrial forestry and the sustainability of communities. Slocan Forest Products says an area supported by the timber industry should have VQOs representative of this fact, but instead the significant amounts of retention and partial retention to protect visual quality are more geared to tourism. In the company's opinion, less restrictive VQOs would not impact on the most common tourism activities in this TSA and landscape design should be used instead of attempting to hide harvesting.

An individual submission says highway viewpoints are not sufficient to address railway viewpoints or resident and village concerns about visual quality. Another individual says the use of community forests and alternative silviculture systems should be considered in visually sensitive areas. The FHA and CREC say sensitivity analyses should be run of the other two options regarding visual quality in the Robson Valley Land and Resource Management Plan (LRMP) report.

Wildlife

Four submissions express concern about the exclusion of high quality caribou habitat from the harvesting land base and suggest that modified, partial or sensitive timber extraction should be considered in these areas. Slocan Forest Products says the area reserved is excessive and that areas outside the timber harvesting land base should provide adequate reserves or refuge for the small number of caribou being managed.

Five submissions comment on the use of buffers adjacent to slide chutes to protect important grizzly bear habitat. Three submissions say the area set aside is very high, reserves along slides should not be a blanket prescription, and modified timber extraction in these buffers should be permitted. Two submissions say 50-metre wide buffers on slide chutes on south and west facing slopes in the Engelmann Spruce-Subalpine Fir zone are not adequate for habitat protection and this approach does not comply with the spirit of the LRMP.

The FHA says the precautionary principle must be exercised in instances of vulnerable or rare species and ecosystems, noting that several of each occur in this TSA.

Old Growth & Biodiversity

The FHA and CREC say the document *An Old Growth Conservation Strategy for the Robson Valley Forest District* should be considered in this Timber Supply Review, and the analysis should account for appropriate management practices in the areas identified in the strategy. At the least a sensitivity analysis is needed to account for old growth management in these areas, according to these groups. In addition the two groups say the so-called antique forests agreed to by the LRMP table should be protected and deleted from the timber harvesting land base.

The FHA and CREC are of the opinion that it's unacceptable for the base case to model an old-seral minimum retention area less than that recommended in the *Biodiversity Guidebook*, nor does this approach conform to current management practices, in their opinion. The groups say this approach may be necessary in other TSAs that cannot currently meet seral stage distribution, but this is not necessarily the case in this forest district. An individual submission says, in the absence of a Higher Level Plan since 1990, the draft landscape units and biodiversity emphasis options in the LRMP should be considered current practice.

Riparian Zones & Watersheds

Three submissions express concern about the impact on timber supply of proposed riparian zones, in addition to other areas removed from the harvesting land base. Zeidler Forest Industries says the impact must be downgraded and the entire riparian management strategy re-assessed, particularly the netdowns for streams with management zones (S1 and S2 streams). Slocan Forest Products says the 50% netdown of S1 and S2 management zones should be reduced to 30% given the current practice of clearcutting the majority of management zones or removing the dominant trees.

CREC questions the statistical reliability of assessing only four mapsheets to approximate the area affected by riparian management requirements. The coalition also says the minimum riparian setbacks under the Code are inadequate to protect domestic water supplies outside community watersheds. The group requests that the LRMP be used as the base case for this factor.

Non-Recoverable Losses

Seven submissions comment on the issue of unsalvaged wood. One individual submission expresses the opinion that the estimated volume of unsalvaged wood should be much higher, due to the nature of mature and overmature timber in this TSA. Five submissions say the estimate of losses seems very high, at one-sixth of the current AAC, a 31.5% increase in unsalvaged timber from the previous Timber Supply Review. The following points are made in support of that position:

- catastrophic events are rare and Table 15 really shows most mortalities from natural, endemic causes. The hemlock looper attack would qualify as catastrophic but since this has happened only once within human memory in this district, it's erroneous to account for it as an annual event. In addition, these losses will decline because the looper primarily attacks overmature stands and the presence of these will decline.
- some losses are already reflected in volume over age curves and netting them out again may be double counting.
- if spruce weevil losses are estimated at 200 m^3 per hectare over the stand rotation, this seems very high as it probably exceeds the total volume/hectare gained over the rotation.
- losses from bark beetles, hemlock loopers and fires are excessive as licensees make special efforts to salvage timber where possible and economic.
- losses from fringe blowdown appear to be calculated per hectare instead of per block as suggested by the methodology. Some fringe damage is usually salvaged.
- to prevent unsalvaged losses, adequate opportunity for harvest activity must be provided when the loss occurs. Setting minimum stumpage fees would also reduce losses.

An individual submission says quite a lot of evidence indicates that the severity of the hemlock looper epidemic is a result of adjacent large openings which produced increased winds and local heating, making the surrounding forests susceptible to loopers. This individual is concerned that continued clearcutting will initiate another looper epidemic.

Socio-Economic Factors

Two submissions note that the economic dependence of this TSA on the forest industry is underestimated in the *Data Package*. An individual submission says a dependency of 65-70% would be realistic. Slocan Forest Products says manufacturing should be identified as wood products manufacturing; the reliance of other economic sectors on the forest sector should be identified; and the number of jobs should be weighted by employment income.

Four submissions comment on the impact of forestry on local communities. Zeidler Forest Industries says while the environment and quality of life are important, jobs and a stable economic base are necessary to enjoy them. Runtz & Associates says the well-being of communities has to be of paramount importance, while Slocan Forest Products says shrinking the land base to protect other values so that only one mill can be supported is a poor way to manage the socio-economic health of the Robson Valley. The Village of Valemount urges the ministry of forests to conduct a proper socio-economic analysis that truly reflects the situation facing the forest industry.

Robson Valley Timber Supply Area

The FHA and CREC maintain the current methodology is weighted very heavily toward the forest industry and it is imperative that the economic base be diversified in this TSA to reduce economic vulnerability. The groups cite surveys in the Robson Valley showing that residents rate scenery, wildlife, clear air, clean water, the quiet rural lifestyle, solitude, and wilderness proximity above economic interests.

Giscome Timber Ltd. note their interest in locating a manufacturing facility in McBride to process cedar, but say they need a significant and assured supply of raw material. Zeidler Forest Industries says if their mill operates at full capacity, they require 346 000 m^3 per year.

Timber Supply Area Analysis Report

Land Base Factors

The FHA submission says that since the wood market is very low and expected by industry analysts to remain low indefinitely, the alliance would expect the operability lines to move downslope. The alliance also expresses uncertainty about the reasons for the increase in the size of the timber harvesting land base. The WATERSHED (We Are The Environmental Reality for Sustainable Harvest and Economic Development) Group says areas identified as having sensitive soils should be re-evaluated and those within helicopter operability should be put back in the land base, given the increase in heli-logging in the past five years.

Three submissions identify areas that should be removed from the harvesting land base (cultural sites, the Raush Valley and the Upper Goat Valley).

Forest Inventory Factors

An individual submission says inventories seem to have changed more with the demand for specific species than with the actual amount of fibre in the forest. Accurate inventories of all species (merchantable and "weed") should be done and periodically updated as soon as possible, according to this submission. Castle Creek Forest Products notes that for 40 years the focus has been on white wood harvest, while the cedar-hemlock profile remains underutilized.

Expected Rate of Growth & Volume Estimates

Slocan Forest Products says estimates of future productivity of current old growth sites is a major issue given that 58 per cent of the harvesting land base is covered by these stands. The company suggests that the results of the Old Growth Site Index (OGSI) study be given serious consideration.

Regeneration Delay

The FHA says 2.6 years is too short and, using the precautionary principle, regeneration delay should be increased to nine years, as modelled in sensitivity analysis 5.14.

Biodiversity & Old Growth

An individual submission says forest cover requirements should be met within harvestable stands rather than by inoperable and riparian areas, as the environmental values need protection throughout the land base.

Two submissions recommend that old growth be managed as per the July 1992 report *An Old Growth Conservation Strategy for the Robson Valley*. The WATERSHED Group says overmature stands are not sustainable and recommends that all mature and overmature stands within the productive land base be harvested using current one-pass management practices. The FHA expresses concern that the base case does not model any forests for future old growth harvest, noting that this timber is important for high quality, value-added wood products. The alliance also points out that old growth outside the timber harvesting land base is modelled as aging forever; this is obviously incorrect and casts doubt on the entire methodology, according to this submission.

The FHA says it is unacceptable for the base case to model a reduced old-seral minimum retention area at less than that recommended in the *Biodiversity Guidebook* and says this approach does not conform to current management practices.

Wildlife

Two submissions refer to a recent inventory that indicates there are no medium or high caribou areas or caribou crossing corridors in the TSA that will conflict with or affect the timber harvesting land base. The WATERSHED Group recommends the caribou restrictions be removed while Slocan Forest Products points to other management units where caribou habitat is protected through forest cover requirements rather than land base withdrawals.

The FHA says 50-metre wide buffers on slide chutes on south and west facing slopes in the Engelmann Spruce-Subalpine Fir zone are not adequate for habitat protection for grizzly bears. This approach also does not comply with the spirit of the Robson Valley LRMP, according to the FHA, noting that the LRMP report also identified areas of very important habitat that should be designated grizzly bear management areas. An individual submission notes that the LRMP identifies both the upper and lower Raush Valley as important wildlife habitat and expresses concern about the impact of logging on this habitat.

Visually Sensitive Areas

Seven submissions comment on visual quality management in this TSA. One individual submission says visual concerns should be given less precedence, while another says harvesting should be selective in visually important areas. The WATERSHED Group notes differences in approach in other management units and says the assumption that high-speed corridors such as highways 5 and 16 have a high visual sensitivity is not realistic and in fact better vistas result from the removal of overmature timber adjacent to the highway. The group recommends that medium and high VQOs are only appropriate for established tourist areas, rest stops and areas adjacent to communities; all the remainder should be rated as not visually sensitive.

Slocan Forest Products says that, given the present emphasis on visual design and the precedents from timber supply reviews in other units, it is appropriate to use higher figures for the allowable disturbance in visually sensitive areas. Four individual submissions address the need to maintain visual quality in the Raush Valley, particularly given current ecotourism developments in the valley. Visual quality requirements in the Raush Valley must be the same as in the main Robson Valley, according to one individual, while another says a visual impact study must be done prior to any harvesting in the valley and asks to be involved in that or any other study.

Hydrological Impacts

Slocan Forest Products says riparian reserve deductions were based on only four mapsheets and result in an area deduction significantly higher than other similar management units (8.68% for Robson Valley, compared to 3.9% for Golden, 4% for Arrow and 6.3% for Revelstoke). The company believes a more complete assessment would produce a lower figure.

Non-Recoverable Losses

Slocan Forest Products is of the opinion that the estimates of losses are significantly higher than would be experienced on an ongoing basis, and may be skewed by recent, unusual occurrences. An individual submission says growth losses associated with the spruce weevil could be minimized by selective harvesting as only stands in full sun appear to be affected. This individual also advocates the end of clearcutting in the Interior Cedar-Hemlock zone, given the link between the hemlock looper outbreak and large new openings that allowed exceptional drying conditions in adjacent stands, making them vulnerable to attack.

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Socio-Economic Impacts

An individual submission says that if the Robson Valley is as dependent on the forest industry as the *Analysis Report* suggests, it isn't logical that the population keeps growing while forestry jobs decline. New residents choose the Robson Valley for lifestyle and are more interested in the trees standing than as potential timber, according to this individual. This submission does not agree that the economic and social viability of the area depends on maximizing timber flow from Crown lands and points to studies in communities where workers were forced to leave the timber industry and often ended up with more take-home pay from tourism or small business jobs, and had far less stress in their lives.

Another individual notes that the slack market for traditional lumber products in the recent period of economic prosperity and low interest rates in the USA is a strong indicator that lumber markets are undergoing a fundamental shift. This submission asks for consideration of future market changes, possibly by examining European markets. Another individual submission notes that decisions that encourage more labour intensive forest work and positive use of other land resources will better serve local people in the long run, instead of furthering the interests of companies from outside the district or province.

The McBride & District Chamber of Commerce says that despite success in expanding the tourism and recreation base a healthy forest economy is vital to maintaining the long-term economic and social viability of the area. The Chamber expresses the wish to maintain a consistent employment base and healthy business environment while making the transition to a diversified economy. The FHA says it's imperative that the economic base be diversified and expresses the opinion that the base case forecast is weighted heavily toward the wants of the timber industry and its employees, precluding options for future generations.

Slocan Forest Products says it is critical that an assured timber supply of 200 000 m^3 be available to support a least one shift at their Valemount mill.

First Nations

The Ktunaxa/Kinbasket Tribal Council advise that the Robson Valley TSA is outside the boundary of the Ktunaxa Nation traditional territory.

The Shuswap Nation Tribal Council says the province's consultation framework and land use referral policy is totally inadequate and contrary to the fundamental laws of Canada. Due to the continued failure of the B.C. and Canadian governments to comply with their fiduciary obligations to the First Nations, the Tribal Council has called on the provincial government to take the following steps:

- institute a standstill policy respecting land and resource uses, including a freeze on creation or renewal of interests in land and resources;
- provide an accounting of resource uses and revenues from traditional territory; and
- negotiate a bilateral agreement for the preparation of Sustainable Development Plans for the Secwepemc Title Territory.

In the absence of a formal bilateral agreement with the provincial government, the Tribal Council says they will not comment on any land use referral. Further, the Tribal Council says they do not agree with the development and/or activities contemplated by the Timber Supply Review referral and cannot guarantee these will not be negatively impacted or stopped as the Council exercise their lawful Secwepemc title, jurisdiction, rights and interests. The Tribal Council also notes that Secwepemc communities do not have the financial and human technical resources to conduct a detailed analysis.

Robson Valley Timber Supply Area

Other Comments

Many submissions commented on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

The Village of Valemount says that the time allowed for public input on the *Data Package* is too short and that communication about the Timber Supply Review and the opportunity for public input needs improvement. CREC also says the time allowed for public review of the *Data Package* is insufficient, especially for groups that receive feedback from membership. Slocan Forest Products says it is distressing to licensees to see how much effort is put into restricting areas from harvesting, but says the *Analysis Report* is a significant step forward from the previous Timber Supply Review, using more up-to-date information and modeling approaches.

An individual submission says the concentration on timber volume is inadequate for decision-making, and timber quality must be considered. This submission says a log grading system for interior species should be instituted and the inventory of standing timber should include estimates of potential timber volumes by grade. For example, this individual says the Robson Valley TSA grows some of the finest quality musical tonewoods in the world, but the potential economic and employment returns from this wood are lost because there's no mechanism to recognize these trees in the bush or in the mills.

CREC requests that a sensitivity analysis be carried out on the potential range of impacts that future climate change may have on expected growth rates, species selection, stand densities, volumes, stand re-establishment time, operability, and losses to fire, insects and disease.

Harvest Levels

Twelve submissions comment on the level of harvesting that should be permitted. Three submissions support maintenance of the current AAC for the following reasons:

- to avoid the loss of existing jobs and the potential to create new ones.
- to ensure a smooth transition to the long-term level.
- to allow the valley time to diversify the economy.
- the timber supply is available to maintain current harvesting commitments.
- the combination of a 10 per cent larger timber harvesting land base (through changes to caribou management, riparian reserve deductions and low site definition) and the use of OGSI information would produce a more optimistic assessment of timber supply, and both are reasonably likely to prove correct.

Nine submissions favour a reduction in the AAC, either to current harvest levels or to begin an orderly reduction to the long-term harvest level. Various reasons were offered for these opinions, including the following:

- to offset the undue concentration of harvesting in the TSA outside reserved areas (Betty Wendle/Cariboo and West Twin areas).
- sustainability of the forest, not just of timber supply, is the primary goal and currently the scales are tipped too far in favour of harvesting.
- local mills have not been able to harvest the current AAC.
- an AAC reduction will not affect volumes harvested because the demand for commodity wood is likely to remain flat.
- given the growth in ecotourism, it would be a mistake to destroy the spectacular scenery of the valley.
- eco-certification of wood from the Robson Valley could be justly denied because of the unsustainable AAC.

- uncertainties exist due to climate change and increased levels of UV radiation, as well as about the size of the timber harvesting land base.
- postponing the inevitable will only make the transition more difficult and puts ecosystems at greater risk.

Allocation of Licences

Carson Logging says the only way to maintain provincial revenues and invigorate the forest industry is to increase the value of products being produced. The company recommends a study of the effect of re-allocating major licensees' quota to 15 or so small mills cutting specialty and value-added products, with a centralized log yard. An individual submission states support for the concept of a community forest and would like to see more timber available to much smaller processors, directly related to the number of local jobs created.

Castle Creek Forest Products advocates for the initiative to advertise a long-term non-replaceable forest licence to utilize the cedar-hemlock profile. The company says this would support employment for a longer term than is presently achieved by category 1 sales and provide the opportunity to regenerate these sites with highly productive stands.

The McBride & District Chamber of Commerce makes three recommendations:

- McBride Forest Industries be allowed to harvest the undercut volumes during the next five years so new owners have an opportunity to establish a secure economic base.
- current licensees be allowed to harvest the original volumes in the non-replaceable Morkill Access licences.
- the 100 000 m^3 volume that's been used for non-replaceable access licences should be used to create a community forest for the McBride area, expand the woodlot program and establish several small quotas for value-added products.

Two submissions note the current AAC includes a five-year non-renewable licence issued in 1991, and say this volume should be deleted from the AAC.

Management Practices

Several submissions make recommendations or express concern about management practices in the Robson Valley TSA. These comments include:

- given difficulties in the timber profile in this TSA, more flexibility in the "harvest the profile" philosophy should be considered.
- cedar-hemlock forests, which are rich in biodiversity and recreation opportunities, are disappearing. These stands should never be clearcut nor should the practice of burning cedar (as has been done in Prince George) be adopted.
- it should not be the licensee's responsibility to regenerate riparian and wildlife habitat areas, given the other public uses.
- priority should be given to high value products, like wood for musical instruments.
- selective logging should be done wherever the soil will allow, and mixed stands should be replaced by planting mixed stands.

Appendix 1

Submissions received by the Robson Valley Forest District

Submissions received on the Data Package

Local government
Village of Valemount

First Nations
Ktunaxa/Kinbasket Tribal Council, Cranbrook

Industry
Slocan Forest Products, Valemount Division
Giscome Timber Ltd., Prince George
Zeidler Forest Industries Ltd., McBride

Interest groups
Canoe-Robson Environmental Coalition, Dunster
Fraser Headwaters Alliance, Dunster

Consultants
E.P. Runtz & Associations, McBride
Thomas & Norwell Forestry Consulting, Kamloops

General public
Six individual submissions

Submissions received on the Timber Supply Analysis Report

First Nations
Shuswap Nation Tribal Council, Kamloops

Industry
Slocan Forest Products, Valemount Division
Castle Creek Forest Products, McBride

Interest groups
WATERSHED (We Are The Environmental Reality For Sustainable Harvest & Economic Development) Group, McBride
McBride & District Chamber of Commerce, McBride
Fraser Headwaters Alliance, Dunster

General public
Nine individual submissions